

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
(Filed March 22, 2012)

**RESPONSE OF THE CALIFORNIA WIND ENERGY
ASSOCIATION TO PETITION FOR EXPEDITED
MODIFICATION OF DECISION 13-02-015**

June 20, 2014

Nancy Rader
Executive Director
CALIFORNIA WIND ENERGY ASSOCIATION
2560 Ninth Street, Suite 213A
Berkeley, California 94710
Telephone: (510) 845-5077
Email: nrader@calwea.org

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
(Filed March 22, 2012)

**RESPONSE OF THE CALIFORNIA WIND ENERGY
ASSOCIATION TO PETITION FOR EXPEDITED
MODIFICATION OF DECISION 13-02-015**

Pursuant to Rule 16.4(f) of the Commission’s Rules of Practice and Procedure, the California Wind Energy Association (“CalWEA”) submits this response to the petition for expedited modification of Decision (“D.”) 13-02-015 filed by Terra-Gen Power, LLC on June 3, 2014.

CalWEA is interested in ensuring that utility procurement is conducted in a reasonable and appropriate manner and shares Terra-Gen’s concerns about how Southern California Edison Company (“SCE”) has conducted the Request for Offers (“RFOs”) authorized in Track 1 of this proceeding. As Terra-Gen notes, “one qualitative element among many considered as part of SCE’s least-cost, best-fit evaluation has been transformed into a threshold screen that precludes further consideration of a resource’s other attributes in the determination of the resource’s value.” It does not make sense, mid-way through an RFO process, to convert what the Commission indicated would be a qualitative factor into a threshold criterion. This is especially important in a case such as this where, as Terra-Gen points out, it is not at all clear

that the new Locational Effectiveness Factors used by SCE are better than the original ones that SCE employed in the RFO.

CalWEA asks the Commission to grant Terra-Gen's petition, to modify D.13-02-015 as Terra-Gen suggests, and to (1) affirm, consistent with Ordering Paragraph 4(c), that effectiveness factors should be used to adjust the valuation of a proposed project, but should not be used as an eligibility requirement to eliminate otherwise viable projects from submitting final bids, and (2) order a public workshop to develop comparable Locational Effectiveness Factors for each of the 27 substations identified in the transmittal letter for the RFO. CalWEA also finds merit in Terra-Gen's proposal that the Commission conduct a public workshop to consider the Track 1 procurement process. If the Commission acts quickly, an abbreviated workshop or stakeholder process could be completed without affecting the scheduled timing of final selection on July 29, 2014.

Respectfully submitted,



Nancy Rader
Executive Director
California Wind Energy Association
2560 Ninth Street, Suite 213A
Berkeley, California 94710
Telephone: (510) 845-5077
Email: nrader@calwea.org

June 20, 2014